Ale

MEMORANDUM:

Re: Preliminary Assessment, McDonnell Douglas Corp.-Tract II, St. Louis Missouri

From: Steven Kinser

To: Gale Wright

McDonnell Doughas has registered 39 separate hazardous waste streams with MDNR for this site. However all wastes are containerized and stored in a designated area for periods not exceeding 90 days prior to manifested shipments to approved off-site treatment/disposal facilities. This is an active facility which is currently being monitored by RCRA authorities. All incidents of known spills have been satisfactorly cleaned up. There is no evidence that there is any uncontrolled or abandoned hazardous waste at this site. Any futher action at this site can and should be her under RCRA rather than CERCLA authorities. All indications from the preliminary assessment are that the activitys at this site are compliant with the existing hazardous waste authorities. I recomend no further action on our part.

Hali (1 Wright Agree 7/26/85

Disagree

Comments

SUPERFUND
AUG 2 8 1985
SITE LOG



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	Cr	A

POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT PART 1 • SITE INFORMATION AND ASSESSMENT

		IFICATION
ı	OI STATE	02 SITE NUMBER
	Mo	MODOO0818906

PART 1 · SITE INFORMA	TION AND ASSESSMENT
II. SITE NAME AND LOCATION	
U1 SITE NAME (Legal common, or descriptive name of site)	02 STREET, ROUTE NO , OR SPECIFIC LOCATION IDENTIFIER
Mc DONNELL DOUGLAS-ST, LOUIS TRACTIL	JISI MCDONNELL & LINDBERGH BLUDS.
	l l cor i nor i
HAZELWOOD, BERKELEY, ST. LOUIS INT. AIRPORT DO COORDINATES LATITUDE LONGITUDE	MO 63166 ST. LOUIS 189 02
38 45 24.0 090 20 18.0	
10 DIRECTIONS TO SITE (Starting from nearest public road)	A STATE OF ASSESSED LAWS STATE
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W. ON JISIMCDONNELL BLUD> TURN AT IST.	RIGHT TO ENTER COMP. COMPLEX.
	
III. RESPONSIBLE PARTIES 31 OWNER (If Angura)	02 STREET . Business making residential)
	<u> </u>
MCDINNELL DOUGLAS CORP.	DEPT, 89/C, BUDG, 305, L-4W, P.O. BOX 5/6
ST, LOUIS CO.	MO 63166 (314) 232 0232
1	
MCDONNELL AIRCRAFT CO.	SAME
SAME	
	() //
13 TYPE OF OWNERSHIP (Check one) A. PRIVATE D. B. FEDERAL:	☐ C. STATE □D.COUNTY ☐ E. MUNICIPAL
(Agency name)	
☐ F. OTHER:(Specity)	G. UNKNOWN
14 OWNER/OPERATOR NOTIFICATION ON FILE (Crock at that apply)	
A. RCRA 3001 DATE RECEIVED: 08 120,80 (3 B. UNCONTROL	LED WASTE SITE ICERCIA 103 c) DATE RECEIVED: 1 ONNE MONTH DAY YEAR
IV. CHARACTERIZATION OF POTENTIAL HAZARD	
01 ON SITE INSPECTION BY (Check at Irbai apply) A. EPA B. EPA B. EPA	A CONTRACTOR C. STATE L.) D. OTHER CONTRACTOR
LI NO DATE 02 27, 85 [] A. EPA LI B. EP	ICIAL I.) F. OTHER: (Specify)
CONTRACTOR NAME(S):	
02 SITE STATUS (Check one) 03 YEARS OF OPER	_
XA. ACTIVE DB. INACTIVE DC. UNKNOWN	BEGINNING YEAR -ENDING YEAR
04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED	
TRACT II STORAGE SITE USED FOR CONTROLL	ED ACCUMULATION OF A VARIETY OF CONTAINERIZA
HAZ, WASTES FOR PERIODS NOT EXCEEDING 9	DAYS, OPERATION IN CONFORMANCE WITH
APPLICABLE STATE & FED. REGULATIONS. SE	PARATE RORA COMPLIANCE FILE MAINTAINED BY AFENCIES.
05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION	
SEE ACRA COMPLIANCE FILE.	STANDPOINT.
NO POTI HAZARD FROM AN UNCONTROLLE	STAMPOINT,
	•
V. PRIORITY ASSESSMENT	
01 PRIORITY FOR INSPECTION (Check one If high or medium a checked, complete Part 2 - Waste Infe	ormation and Part 3 Description of Hazardous Conditions and Incidents)
A. HIGH B. MEDIUM C. LOW (Inspection required promotly) (Inspection required promotly)	e evaleble bases) O. NONE (No further action needed, complete current disposation form)
VI. INFORMATION AVAILABLE FROM	
01 CONTACT 02 OF (Agency Organ	Wation) 03 TELEPHONE NUMBER
ROBT, KAATMAN MCDONNE	U AIRCRAFT - ENV. COMPLIANCE (314) 232 0292
04 PERSON RESPONSIBLE FOR ASSESSMENT 05 AGENCY	06 ORGANIZATION 07 TELEPHONE NUMBER 08 DATE
MIKE DUVALL MONR	DER 5660 13141 849 1313 04 11 85
FRA CORN 2070 17 (7 81)	OEX TO TOTAL MONTH DAY YEAR

ERRIS

85 AUG RECT

AUG 05 1985



WASTE MANAGEMENT

ABANDONED/UNCONTROLLED HAZARDOUS WASTE SITE INVESTIGATION

Preliminary Assessment
"3012" Grant Summary
Case # 534.717

McDonnell Douglas Corporation - Tract II, St. Louis Facility
J. S. McDonnell and Lindbergh Boulevards
P. O. Box 516
St. Louis County, MO 63166

1. INVESTIGATOR: Mike Duvall

Chief - Waste Management Unit

Missouri Department of Natural Resources

St. Louis Regional Office

SUPERFUND

Chie 200

II. DATE INVESTIGATION INITIATED: February 10, 1985

DATE INVESTIGATION COMPLETED: April 11, 1985

'AUG U D 194.3

SITE LOG

III. BACKGROUND OF THE INVESTIGATION:

The McDonnell Douglas complex located in northwest St. Louis County encompasses the company's corporate world headquarters and a wide variety of manufacturing activities and is the largest employer in the state of Missouri. Primary divisions represented at the complex are as follows:

- 1. McDonnell Aircraft Company manufactures airframe components and provides final assembly of military aircraft.
- 2. McDonnell Douglas Astronautics Eastern Division manufactures components and provides final assembly of missiles and space craft.
- 3. McDonnell Automation Company is involved in data processing within both public and private sector markets.

The Tract II facility includes a large portion of the company's heavy manufacturing activities. Corporate staff have registered 39 separate hazardous waste streams with MDNR for this site. General waste groupings and the processes generating such wastes can be summarized as follows:

- Spent acid solutions from various chemical milling/etching, pickling and cleaning processes involving titanium and steel as the principal base metal components.
- 2. Spent caustic solutions from similar processes involving aluminum alloys.
- Cyanide and sulfide wastes from metal plating operations.
- 4. Spent halogenated and non-halogenated solvents from cleaning and painting operations.
- 5. Paint overspray and clean-up sludge.
- 6. Drain lubricating and hydraulic oils from equipment maintenance.

All wastes are containerized and stored in a designated area for periods not exceeding 90 days prior to manifested shipments to approved off-site treatment/disposal facilities. The company has developed a comprehensive program which ensures proper internal management of wastes including provisions for identifying, drumming, and labeling, from the various points of generation in the manufacturing sectors to the designated storage area.

Storage takes place in a structure consisting of 3 walls and a roof to shed precipitation. Accidental leakage/spillage is controlled by a concrete floor underlying the area, with slopes provided at strategic intervals to drain liquids to the plant sewer system. The plant sewers are connected to a pretreatment works which ultimately discharges to a municipal POTW operated by MSD. The storage area is provided with all necessary emergency response equipment and other required appurtenances. Potentially incompatible materials are separated by curbing, and adequate aisle space is maintained between drum rows.

Separate files are maintained by the agencies documenting the RCRA compliance history of the facility. A review of these files, including past inspection reports prepared by the writer, confirms that the McDonnell Tract II facility is being operated in compliance with all applicable requirements of the federal RCRA and the corresponding state regulatory programs. There are no enforcement issues pending with respect to this facility. No evidence has been found indicative of major spills or other releases from the storage area. There is no evidence to suggest that containerized wastes have been stored in excess of the prescribed 90 day interval.

Presumably the facility was placed on the ERRIS list based upon an erroneous notification of hazardous waste activity filed with the U. S. EPA by McDonnell in August 1980. At that time corporate staff acknowledged the possibility of storing drummed wastes for intervals exceeding 90 days at the storage structure planned for Tract II. Construction of the structure did not commence, however, until after November 1980, thus disqualifying the company from exercising the option of filing a "Part A" application for a pre-existing storage facility. Upon construction of the Tract II facility, the facility was operated in accordance with "generator only" standards. This situation was previously clarified in correspondence between Mc-Donnell and EPA in September 1982. Further information on this subject is provided by Attachment #4 which consists of a letter and attachments dated March 1, 1985, from J. C. Patterson to the writer.

IV. IDENTITY OF PERSONS REFERENCED IN REPORT CONTACT INFORMATION

ASSOCIATION

Plant Engineer

Mr. Robert Kaatman Environmental Compliance Section McDonnell Aircraft Company Dept. 891C, Building 305, L-4W P. O. Box 516 St. Louis County, Missouri 63166 (314) 232-0232 Mr. Ron Darling
Waste Management Section
St. Louis County Department of Community
Health and Medical Care
801 South Brentwood Boulevard
Clayton, Missouri 63105
(314) 854-6927

County Field Officer/ Assistant Investigator

Ms. Nancy Miceli Environmental Compliance Section McDonnell Aircraft Company Plant Engineer

Mr. Jerome Patterson
Environmental Compliance Section
McDonnell Aircraft Company

. Branch Manager

V. BRIEF SUMMARY OF INFORMATION OBTAINED:

On-site inspections and meetings were conducted to gather the information for this investigation. In addition, telephone interviews were held with the principal parties involved. Finally, the existing agency file (RCRA compliance) on the facility was reviewed to ascertain all relative background.

No evidence has been found indicative of abandoned/uncontrolled hazardous waste activity at the McDonnell Tract II facility. An authorized site for controlled storage of containerized hazardous waste in conformance with standards for "generator only" is located at the facility. This site has been determined to be in compliance with all applicable requirements.

A recent incident involving accidental spillage and subsequent clean-up of a small amount of dielectric fluid (PCB) has been reported on the Tract II premises by the company. The incident in question was promptly identified and satisfactorily remediated by McDonnell staff and has no correlation with the designated storage area for containerized wastes.

VI. DETAILED ACCOUNT OF INVESTIGATION:

An initial telephone conference was held with Nancy Miceli of the McDonnell Aircraft - Environmental Compliance Section on February 11, 1985, to explain the purpose of the inquiry and solicit a preliminary response. Ms. Miceli agreed to confer on the matter further with other staff preparatory to formulating a formal response and requested a letter outlining the scope of the investigation. The attached letter was directed the same day to Mr. J. C. Patterson, Branch Manager, by the writer.

A site visit was subsequently conducted February 20, 1985, to substantiate that conditions at the Tract II designated storage area were the same as documented in the previous RCRA compliance inspection. Such was confirmed to be the case upon observation of the area. An on-site conference was also held at this time with Ms. Miceli and Mr. Patterson in which it was established that management practices at the "generator only" storage facility have remained unchanged. Mr. Patterson further stated that no uncontrolled

or abandoned waste disposal areas exist anywhere on the Tract II site or any other part of the McDonnell - St. Louis complex. Mr. Patterson indicated this conclusion was based upon first-hand knowledge of the complex acquired from many years tenure with the corporation as well as interviews with numerous plant personnel.

The investigator also inquired about the occurrence of any significant historical spill events involving hazardous materials on the premises. Mr. Patterson replied that to the best of his knowledge, the only incident of any consequence had transpired very recently and had been duly reported to the MDNR-EER office. The attached copy of EER log dated February 19, 1985, confirms the notification of a minor spill involving an estimated 25 gallons of PCB contaminated oil. Company staff initiated clean-up measures immediately upon discovery of the problem. Due to time restrictions on the day of inspection (February 20), the writer committed to return to the Tract II site to perform reconnaissance of the area impacted by the spill.

Arrangements were made for a follow-up visit to the site on February 27, 1985. The writer was accompanied on the follow-up visit by Mr. Ron Darling of the St. Louis County Department of Community Health and Medical Care - Waste Management Office. An on-site conference was held with Mr. Robert Kaatman of the McDonnell Aircraft - Environmental Compliance Section who led the inspectors on a tour of the area in question. It was learned that two separate incidents involving spillage of dielectric fluids containing PCBs had occurred and have since been remediated. These occurrences involved a distinctly separate portion of the Tract II facility from that of the designated container storage area.

The first incident is categorized as a "historic" spill located outside of manufacturing building 66. Reportedly some electrical capacitors had been removed from service and stockpiled at the edge of the blacktopped parking lot surrounding the building. Upon hauling away the units for final disposition, company staff noted a small amount of oil stain on the ground indicating some spillage. The company responded by exhuming soil from the spill zone. The area was substantially over-excavated laterally and vertically away from the area of visible soil discoloration to ensure thorough clean-up of all residual contamination. The clean-up project resulted in 24 drums of excavated soil which were handled as fully regulated PCB-contaminated waste in accord with TSCA requirements. The drummed material was transported by Rollins Environmental Services for final disposition at an approved incinerator operated by Rollins. Following the clean-up activity, McDonnell staff collected soil-core samples in a grid pattern over the area for analysis by an independent testing lab. The resulting data indicated no residual PCB contaminants at the l ug/g limit of detection for the Arochlor species tested.

The second incident involved the accidental spillage of approximately 20 gallons of capacitor fluid onto a concrete loading ramp directly outside manufacturing building 62. Company staff reportedly took immediate response measures to contain the released material using absorbants. Residual contaminants were removed from

the concrete apron by scrubbing with a suitable cleaning solvent. Handling and disposition of the resultant clean-up material was the same as for the clean-up previously described.

Attachment #5 includes a letter and supporting documents dated April 17, 1985, from Robert Kaatman to the writer. This attachment provides a synopsis of the PCB incidents.

VII. CONCLUSION AND RECOMMENDATIONS:

It is concluded that the original basis for listing of the McDonnell Douglas - Tract II site on the ERRIS track was erroneous. The designated area for storage of containerized waste is designed and operated in conformance with RCRA and corresponding state requirements applicable to generators of hazardous waste and as such is a controlled site.

The incidents concerning spillage of dielectric fluids containing PCB contaminants have been adequately identified and remediated by company staff. These incidents represent the only known occurrences of historical spillage of hazardous materials anywhere on the Tract II complex.

In the judgement of the writer, no further action is warranted or necessary in this case. It is recommended that the site be removed from the ERRIS track.

VIII. SIGNATURES:

PREPARED BY:

Mike Duvall

Chief - Waste Management Unit

St. Louis Regional Office

Missouri Department of Natural Resources

4-24-85 Date

4/24/85

APPROVED BY:

F. Donald Maddox

Regional Administrator St. Louis Regional Office

Missouri Department of Natural Resources

IX. LIST OF ATTACHMENTS:

- 1. EPA form 2070-12
- 2. MDNR-EER log of February 18, 1985
- 3. Letter of February 11, 1985, from Mike Duvall to J. C. Patterson
- 4. Letter of March 1, 1985, from J. C. Patterson to Mike Duvall with enclosures
- 5. Letter of April 17, 1985, from Robert Kaatman to Mike Duvall with enclosures
- 6. ERRIS turnaround document dated April 6, 1984

- Tract II drawing per McDonnell Douglas records
 County highway map with site location referenced

FDM/MD/mc ·

In respect to "unreported abandoned waste disposal sites," there are none at this site. The "CERCLA" act required notification of abandoned sites in June 1981. In May 1981, we performed a survey of our facility and personnel and confirmed the fact that no hazardous waste disposal sites existed on this property.

In respect to "past hazardous material spills," the only ones we can recall are the two recently reported "PCB" spills. On 27 February 1985, Bob Kaatman escorted you and Ron Darling (St. Louis County) on a detailed inspection of both PCB spill sites. At that time you and Mr. Darling were more than assured that both spills were properly reported and thoroughly cleaned up. This was always our contention; we do, however, appreciate your concurrence. Should you require further information concerning the handling of these spills, feel free to contact Bob Kaatman at any time. Enclosures (1) and (2) are copies of our Standard Maintenance Procedures concerning spill response and PCB handling.

I have personally examined and am familiar with the information submitted on this report, and I hereby certify under penalty of law that this information is true, accurate, and complete to the best of my knowledge and ability. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

MCDONNELL AIRCRAFT COMPANY

J. C. Patterson, Branch Manager

Environmental Compliance Dept. 891C, Bldg. 305, L-4W

JCP/RHK:bem

QUEST FOR LABORATORY ANA SAMPLE NO. PERFORM ANALYSIS FOR ITEMS CHECKED 行为以证实的思想的证明的证明的证明 LABORATORY TO BILL AGAINST MDC P.O. DATE SUBMITTED S LPR 26 MBW DEPOSIT ANALYSIS NITROGEN/AMMONIA ALUMINA NITROGEN/KJELDAHL CALCIUM CARBONATE ALKALINITY/METHYL ORANGE ALKALINITY/PHENOLPHTHALEIN NITROGEN/NITRATE П CALCIUM CHLORIDE ALUMINUM NITROGEN/NITRITE CALCIUM HYDROXIDE INTROGEN/ORGANIC ANTIMONY CALCIUM OXIDE ARSENIC ACCOUNT NITROGEN/TOTAL CALCIUM PHOSPHATE BARIUM OXYGEN/DISSOLVED CALCIUM SILICATE BERYLLIUM PHENOL CALCIUM SULFATE B.O.D. D PHENOL CARBON DIOXIDE BORON PHOSPHATE/ORTHO CARBON TETRACHLORIDE EXT PHOSPHATE/POLY
PHOSPHATE/TOTAL CALCIUM CHROMIC OXIDE COPPER CARBON DIOXIDE PHOSPHORUS, TOTAL COPPER OXIDE CERIUM POTASSIUM FERRIC OXIDE CHELANT SILVER SODIUM IRON CARBONATE TRON PHOSPHATE CHLORIDES CHLORINE LOSS AT IGNITION MAGNESIUM CARBONATE SOLIDS/DISSOLVED CHROMIUM/HEXAVALENT CHROMIUM/TOTAL SOLIDS/SETTLEABLE MAGNESIUM HYDROXIDE CHROMATE TIS SOLIDS/SUSPENDED MAGNESIUM OXIDE O SOLIDS/TOTAL MAGNESIUM PHOSPHATE COBALT C. O. D. TY SOLIDS/TOTAL VOLATILE MAGNESIUM SILICATE MAGNETIC IRON OXIDE COPPER COLOR SOLIDS/VOLATILE SUSPENDED SULFATE PHOSPHOROUS PENTOXIDE POTASSIUM OXIDE SULFATE/HUEY PLATES CONDUCTANCE/SPECIFIC SULFIDE CYANIDE SILICON DIOXIDE П SODIUM CHLORIDE DETERGENTS SULFITE THORIUM SODIUM OXIDE DUST FALL/SOL & INSOL MATTER TIN SODIUM SULFATE DUST FALL/MICROSCOPIC FLUORIDE TITANIUM SULFUR GREASE & OIL SULFUR TRIOXIDE TURBIDITY VANADIUM ZINC CARBONATE HARDNESS/CALCIUM ZINC OXIDE HARDNESS/MAGNESTUM ZIRCONIUM HARDNESS/TOTAL PCB. (Dom HYDRAZINE WASTE ANALYSIS THE STANDARD COMMENTS HYDROCARBONS CHARACTERISTIC OF CORROSIVITY IRON CHARACTERISTIC OF E.P. TOXICITY MICROBIOLOGICAL ANALYSIS LEAD CHARACTERISTIC OF IGNITABILITY MAGNESIUM CHARACTERISTIC OF REACTIVITY ALGAE MANGANESE HEAT CONTENT BTU'S/LB BACTERIA MERCURY FUNGI -4 % BY WT. - NON-COMBUSTIBLE MOLYBDENUM

CORROSION COUPONS, PER ATTACHED NUMBERED LIST, CLEAN AND WEIGH

REAL MANAGEMENT DATE SAMPLE TAKEN: 10-10-89 and Andrews (10) 1000 (10)

NICKEL

NIGBIUM

SAMPLE IDENTIFICATION: POST CLEAN UP A TANK MITTER

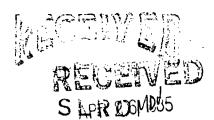
% BY WT. - VOLATILES AT 100°C

% BY WT. - VOLATILES AT 600 C

SPECIFIC GRAVITY @ 60°F

REMARKS: SAMPLE COLLECTED From 17hour (3) locations near highest THE THE PARTY

Box 516, Saint Louis, Missouri 63166 (314) 232-0232



09 January 1985

WASTE MANAGEMENT

U.S. Environmental Protection Agency Region VII 324 East Eleventh Street Kansas City, Missouri 64106

Attention: Mr. Morris Kay
Regional Administrator

REGISTERED MAIL - RETURN RECEIPT

Dear Sir:

The purpose of this letter is to report that McDonnell Douglas Corporation, St. Louis, Missouri, has recently discovered a historic spill (or spills) of PCB's on our property and has placed the contaminated earth in sealed metal containers pending disposal. Our investigation convinces us that the spill(s) occurred in 1978 or 1979. We have not previously reported this situation under the CERCLA regulations because it only recently came to light.

The pertinent facts are as follows:

- Site Location. McDonnell Douglas Corporation
 St. Louis (Lambert Field) Facilities
 Bldg. 66
- 2. Type of Contaminant: PolyChlorinated Biphenyl (PCB)
- Amount Spilled: Unknown
- 4. Date of Spill(s): Unknown, but before 1980
- 5. Material Contaminated: Earth
- 6. Volume of Earth: 176.5 cubic feet
- 7. Average PCB Concentration: 39.4 micrograms/gram (ppm)
- 8. This contaminated earth was located on our private property. This property is surrounded by a six-foot-high chain link fence and is

not accessible by the public. An armed security guard controls entrance to this site. Upon notification, we established a grid system for the suspected spill area and collected a series of samples. The analysis of these samples allowed us to define the area of contamination. Because the average PCB concentration was 39.4 micrograms/gram (ppm), this area did not pose a substantial risk to people or the environment. Based on the grid system, we have excavated this area to a depth of one foot and placed this earth in 55-gallon steel drums. These drums are closed, properly labeled and stored while we negotiate a disposal contract.

- 9. A composite post-cleanup soil sample was collected. The analysis of this sample was "less than I microgram/gram" with a detection limit of I microgram/gram.
- 10. The PCB analysis was performed by an independent testing laboratory using EPA methods.

If you have any questions, please contact us.

Sincerely,

MCDONNELL AIRCRAFT COMPANY

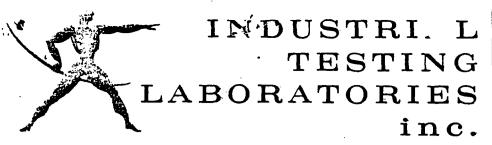
J. C. Patterson, Branch Manager

Environmental Compliance

Dept. 891C, Bldg. 305, L-4W

Phone (314) 233-9824

JCP:bem



2350 Seventh Blvd.

St. Louis, Missouri 63104

Chemists

Engineers

Metallurgists

314/771-7111

Report No. 84-10-148

October 23, 1984

Examination of three (3) samples submitted.

McDonnell Douglas Corp. Dept. 191C Bldg. 305 Level 4W St. Louis, MO. 63166

P.O.: F-40205C

Attn: Mr. J. C. Patterson

TEST REPORT

Sample Identification	PCB's Aug/g	Arochlor I.D.
4146	*1	1248
4147	*1	1248
4148	*1	1248

Test Method: Gas Chromatography Electron Capture Detector.

*less than 1; limits of detection 1/ug/g

Respectfully submitted,

INDUSTRIAL TESTING LABORATORIES, INC.

Allan M. Siegel, P.E.

Director

Lab No. 53874-6 LB11392 JWS/hj

U. S. ENVIRONMENTAL PROTECTION AGENCY OFFICE OF EMERGENCY AND REMEDIAL RESPONSE DATA BASE UPDATED 84/06/04 T.1 - ERRIS TURNAROUND DOCUMENT

PAGE: 2,324 RUN DATE: 84/06/04 RUN TIME: 23:36:26.

SITE DATA

ENFORCE. EVENTS

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	*	. *	REMEDIAL A	CTION (RD)	*/*	*/*	*_* *_*	**	* <u>_</u> *	**
	*	. *	REMOVAL AC	TION (RV)	*/*	*_/_*	**	**	**	**

ENFORCEMENT INVESTIGATION (EI) *_

ADMINISTRATIVE ORDER (AO)

JUDICIAL ACTION (JA)

THE PERSON OF TH APR 26

WASTE MANAGEMENT

ENVIRONMENTAL PROTECTION AGENCY

Generator Annual Hazardous Waste Report (cont.)

This report is for the calendar year ending December 31, 1981.

VII. GENERATOR'S EPA I.D. NO.

VIII. FACILITY NAME (specify facility to which all wastes or this page were shipped)

L.W.D., Inc.

X. FACILITY ADDRESS

P.O. Box 327 Calvert City, KY 42029

IX. FACILITY'S EPA I.D. NO.

[F] K, Y, D, O, 8, 8, 4, 3, 8, 8, 1, 7

XI. TRANSPORTATION SERVICES USED (List the name and EPA identification numbers of all transporters whose services were used during 1981. This section to be completed only once. Do not repeat on supplemental sheets.)

KYD 088438817 L.W.D., Inc.

KSD 070902952 K.I.E.S. Transport

44.4

かはおりれ

MOD 068521228 Bob's Home Service, Inc.

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32	-operations	33 34	43 46 47 50 F 0 0 3 F 0 0 5	51 59	60
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XIII. COMMENTS (enter information by section number—see instructions)

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

This report is for the calendar year ending December 31, 1981.

그 그렇게 되어 보다는 얼마 하는 것 같아. 그렇게 하고 하는 것 같아. 그리고 있다. 하는 것 같아. 사람이 사용하다 사람이 없다고 있다면 없다.	
GENERAL INSTRUCTIONS: If you received a preprinte label attached to the mailing envelope in which this for	ed m
MOD000818906 O7 G Information on the label is incorrect, draw a line through	ne i
MCDONNELL DOUGLAS CORP- ST 10015 TRACTT and provide the correct information in the appropriate sec	C
ATTN: PATTERSON JEROME SUPERVIS PO BOX 516 IRACI II tion below. If the information is correct and complete, leave supervision below blank. If you did not receive	
ST. LOUIS MO 63166 preprinted label, complete all sections. REFER TO THE SPICIFIC INSTRUCTIONS CONTAINED IN THIS BOOKLE	E- '
BEFORE COMPLETING THIS FORM, The information of	e- '-
Please print/type with elite type (12 characters per inch) quested in this report is required by law (Section 3002 of the Resource Conservation Recovery Act).	ie .
I. GENERATOR'S EPA I.D. NUMBER	
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	ر (بازاد) در دست
II. NAME OF INSTALLATION	
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III. INSTALLATION MAILING ADDRESS	- 4
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IV. LOCATION OF INSTALLATION (if different than section III above)	
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Street or Route number	
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City or Town State Zip Code	
V. INSTALLATION CONTACT	;
121 P AT T E R S O N , J E R O M E C	
15-16 45 Name (last and first)	*
13 11 4 - 12 13 12 1 - 13 13 1 1 9	
46 55	
Phone No. (area code & no.)	
VI. CERTIFICATION	
Ecertity under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the	
submitted information is true, accurate, and complete. Lam aware that there are significant penaltics for submitting false information, including the possibility of tipe and imprisonment.	
- (ail m My o or K.D. Sing leton	-
R.D. Singleton, Director, Plant Engineering 10 JAN 83	1

13.200

Print/Type Name

Generator Annual Hazardous Waste Report (cont.)

This report is for the calendar year ending December 31, 1981.

Date rec'd: Rec'd by:

VII. GENERATOR'S EPA I.D. NO.

IX. FACILITY'S EPA I.D. NO.

LF | K | S | D | O | 7 | O | 9 | O | 2 | 9 | 5 | 2 |

VIII. FACILITY NAME (specify facility to which all wastes of this page were shipped)

It (telephone in a

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N.I.E.S., Inc.

X. FACILITY ADDRESS

8808 N. 127 St. East P.O. Box 745 Wichita, KS 67201

XI. TRANSPORTATION SERVICES USED (List the name and EPA identification numbers of <u>all</u> transporters whose services were used during 1981. This section to be completed only once. Do not repeat on supplemental sheets.)

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XII. WAS	TE IDENTIFICATION	- -			Jnit of
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XIII. COMMENTS (enter information by section number—see instructions)

ENVIRONMENTAL PROTECTION AGENCY

Generator Annual Hazardous Waste Report (cont.)

This report is for the calendar year ending December 31, 1981.

Date rec'd: _______ Rec'd by: ______

VII. GENERATOR'S EPA I.D. NO.

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IX. FACILITY'S EPA I.D. NO.

F K S DO 7 0 9 0 2 9 5 2

VIII. FACILITY NAME (specify facility to which all wastes on this page were shipped)

N.I.E.S., Inc.

X. FACILITY ADDRESS

BETWEEN THE STATES

8808 North 127th St. East P.O. Box 745 Wichita, KS 67201

XI. TRANSPORTATION SERVICES USED (List the name and EPA identification numbers of <u>all</u> transporters whose services were used during 19g1. <u>This section to be completed only once.</u> Do not repeat on supplemental sheets.)

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XIII. COMMENTS (enter information by section number—see instructions)

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ENVIRONMENTAL PROTECTION AGENCY

Generator Annual 'Hazardous Waste Report (cont.)

This report is for the calendar year ending December 31, 1981.

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IX. FACILITY'S EPA I.D. NO.

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VIII. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Bob's Home Service, Inc.

X. FACILITY ADDRESS

R.R. 1, Box 116-F Wright City, MO 63390

XI. TRANSPORTATION SERVICES USED (List the name and EPA identification numbers of all transporters whose services were used during 1981. This section to be completed only once. Do not repeat on supplemental sheets.)

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XIII. COMMENTS (enter information by section number—see instructions)

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SEPA

Potential Hazardous Waste Site

RECEIVED

Preliminary Assessment

APR 26 1985

ATTACHMENT # 1

SUPERFUND AUG U 5 1985 SITE LOG MISSOURI DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL EMERGENCY RESPONSE ' 'RT County: ST. LOUIS - spell fell

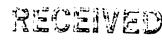
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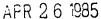
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COMPANY: McDona	ld Douglas	CONT	ACT NAME: Nanc	y Micell		٠ <u>٠ </u>
STREET:		CITY	//COUNTY: _St	Louis		L VOM
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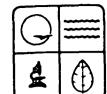
ATTACH. #2

Sam Brenneke

ATTACH. #3







MISSOURI DEPARTMENT OF NATURAL RESOURCES

Box 176 Jefferson City. Missouri 65102 (314) 751-3443

O.

February 11, 1985

WASTE MANAGEMENT

Mr. J. C. Patterson, Branch Manager Environmental Compliance Section McDonnell Aircraft Company Box 516 St. Louis, Missouri 63166

Dear Mr. Patterson:

This will follow up our telephone conference regarding investigation of the tract II designated storage area for containerized hazardous wastes at the McDonnell Douglas - Hazelwood complex.

As you know, staff of the Missouri Department of Natural Resources - St. Louis Regional Office have conducted previous compliance inspections of the facility pursuant to the federal Resource Conservation and Recovery Act and the Missouri Hazardous Waste Management Law. These inspections have determined the company to be in compliance with applicable regulations for the management of wastes at the tract II site. Our evaluations of the facility have been based upon McDonnell's declaration of intent to operate the storage area in conformance with "generator only" standards. Conversely we understand that wastes have not been stored on the premises for periods exceeding 90 days, to prevent classification of the site as a TSDF.

In order to confirm that the above-stated scenario remains a valid assessment of management practices, and to discuss the possibility of any unreported abandoned waste disposal sites or significant incidents of past hazardous material spills on the premises, I believe an on-site conference is appropriate. Please advise if the scheduled meeting for February 20, 1985, poses any problem for Ms. Miceli or yourself. I would also request that McDonnell Douglas Corporation prepare a statement to the Department addressing this matter.

Sincerely,

Mike Duvall, Chief

Waste Management Unit

St. Louis Regional Office

Duracl

MD:mc

ATTACH. #4

MCDONNELL AIRCRAFT COMPANY

Box 516, Saint Louis, Missouri 63166 (314) 232-0232

APR 26 1985

WASTE MANAGEMENT

01 March 1985

Missouri Department of Natural Resolution
St. Louis Regional Office
8460 Watson Road
St. Louis Missouri 63119

St. Louis, Missouri 63119

Attention: Mr. M. Duvall, Chief Waste Management Unit

Reference: (a) M. Duvall Letter to J. C. Patterson dated 11 February 1985

Enclosure: (1) Standard Maintenance Procedure 190-70-9

(2) Standard Maintenance Procedure 190-70-10

Dear Mr. Duvall:

This letter is in response to your referenced letter concerning "generator only" status of our Tract II site (EPA: MOD000818906; Missouri: 01248).

In August 1980, we submitted, to EPA, notification that this site was involved in "treatment, storage, and disposal" (TSD). We did this because at that time it was our operating practice to accumulate (store) drums of hazardous waste in lots of 80 drums to allow us to minimize freight costs by completely filling an over-the-road trailer. This practice caused us to exceed the new 90-day storage limit. We intended to begin construction of a "greater than 90-day" storage building prior to the 18 November 1980 Part "A" filing date.

Due to internal proceedings, we were unable to begin construction by 18 November 1980, and thus we could not quality as an existing storage facility. We elected not to be a storage facility at that time. We initiated a program of holding drummed waste at this site up to but not exceeding 90 days; therefore, we are not now considered a "storage" site as we had previously claimed. Note: This situation was previously explained in our letter dated 14 September 1982 to U.S. EPA (Robert L. Morby).

MCDONNELL DOUGLAS

POTENT	TENTIAL HAZARDOUS WASTE SITE		L IDENTIFICATION	
SEPA . PRI	ELIMINARY ASSESSMENT	OI STATE 02	STE NUMBER	
PART 3 - DESCRIPTION	OF HAZARDOUS CONDITIONS AND INCIDENT	8		
II. HAZARDOUS CONDITIONS AND INCIDENTS (CONTIN	ued)			
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01 D K. DAMAGE TO FAUNA	02 □ OBSERVED (DATE:	D POTENTIAL	[] ALLEGED	
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01 L CONTAMINATION OF FOOD CHAIN 04 NARRATIVE DESCRIPTION	02 🗆 OBSERVED (DATE:)	☐ POTENTIAL	□ ALLEGED	
01 M. UNSTABLE CONTAINMENT OF WASTES	02 □ OBSERVED (DATE:)	□ POTENTIAL	□ ALLEGED	
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01 IN. DAMAGE TO OFFSITE PROPERTY 04 NARRATIVE DESCRIPTION	02 DOSERVED (DATE:)	□ POTENTIAL	O ALLEGED	
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01 [] O. CONTAMINATION OF SEWERS, STORM DRAINS 04 NARRATIVE DESCRIPTION	6, WWTPs 02 OBSERVED DATE:)	☐ POTENTIAL	D ALLEGED	
01 P. ILLEGAL/UNAUTHORIZED DUMPING 04 NARRATIVE DESCRIPTION	02 □ OBSERVED (DATE:)	POTENTIAL.	☐ ALLEGED	
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05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL,	; ;			
IIL TOTAL POPULATION POTENTIALLY AFFECTED				
IV. COMMENTS				
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EP# FORM 2070-12 (7-81)

V. SOURCES/OF INFORMATION (CRE specific references, e.g., state fine, sample analysis, reports)

I IDENTIFICATION

POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT		DI STATE 02	
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POTENTIAL HAZARDOUS WASTE SITE

I. IDENTIFICATION

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IL WASTE ST	TATES, QUANTITIES, AN	D CHARACTER	ISTICS			···	
O1 PHYSICAL ST Li A SOLIO Li B. POWDEI 13 C. SLUDGE	☐ A SOUD ☐ ☐ E SLURRY ☐ MUST DO S. ☐ B. POWDER, FINES ☐ F. LIQUID ☐ TONS ☐ ☐ C. SLUDGE ☐ G. GAS ☐ CUBIC YARDS		TY AT SITE 03 WASTE CHARACTERISTICS (Check as that a mospendent) : A TOXIC : E SOLU		JBLE I. I HIGHLY VOLATILE CTIOUS I. J. EXPLOSIVE MAJBLE I. K. REACTIVE		
() D. OTHER	(Specify)	NO OF DRUMS					
III. WASTE T	YPE						
CATEGORY	SUBSTANCE N	AME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS		
SLU	SLUDGE				<u> </u>		
OLW	OILY WASTE						
SOL	SOLVENTS						
PSD	PESTICIDES				A		
occ	OTHER ORGANIC C	HEMICALS					
ЮС	INORGANIC CHEMIC	CALS					
ACD	ACIDS						
BAS	BASES				1		
MES	HEAVY METALS			/			
IV. HAZARD	OUS SUBSTANCES	Appendix for most freque	ntly cited CAS Numbers)		· <u>·······</u>		
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FDS					 	\	<u> </u>
	/1			FDS	<u> </u>		<u> </u>
41. SOURCE	SOF INFORMATION ICE	ie specific references, é.,	g., state files, sample analysis,	reports)			
EPAFORM 207	0-12 (7-0-)						
	₩14 (7·81)						•

QUEST FOR LABORATORY ANA PERFORM ANALYSIS FOR ITEMS CHECKED DATE SUBMITTED LABORATORY TO BILL AGAINST MDC P.O. S LPR 206 MBW DEPOSIT ANALYSIS ACIDITY NITROGEN/AMMONIA ALUMINA NITROGEN/KJELDAHL CALCIUM CARBONATE ALKALINITY/METHYL ORANGE NITROGEN/NITRATE CALCIUM CHLORIDE ALKALINITY/PHENOLPHTHALEIN ALUMINUM NITROGEN/NITRITE CALCIUM HYDROXIDE INTROGEN/ORGANIC CALCIUM OXIDE ANTIMONY ARSENIC A NITROGEN/TOTAL CALCIUM PHOSPHATE BARIUM OXYGEN/DISSOLVED CALCIUM SILICATE B. C. D.
BORON CALCIUM SULFATE PHENOL D PH 30 CARBON DIOXIDE PHOSPHATE/ORTHO BORON CARBON TETRACHLORIDE EXT PHOSPHATE/POLY CALCIUM CHROMIC OXIDE PHOSPHATE/TOTAL COPPER PHOSPHORUS, TOTAL COPPER OXIDE CARBON DIOXIDE CERIUM POTASSIUM FERRIC OXIDE SELENIUM CHELANT TI IRON CARBONATE SILVER
SODIUM IRON PHOSPHATE CHLORIDES CHLORINE LOSS AT IGNITION MAGNESIUM CARBONATE SOLIDS/DISSOLVED CHROMIUM/HEXAVALENT SOLIDS/SETTLEABLE MAGNESIUM HYDROXIDE CHROMIUM/TOTAL MAGNESIUM OXIDE CHROMATE SOLIDS/SUSPENDED SOLIDS/TOTAL MAGNESIUM PHOSPHATE COBALT. SOLIDS/TOTAL VOLATILE MAGNESIUM SILICATE C. O. D. SOLIDS/VOLATILE SUSPENDED MAGNETIC IRON OXIDE COPPER SULFATE FT PHOSPHOROUS PENTOXIDE COLOR POTASSIUM OXIDE SULFATE/HUEY PLATES CONDUCTANCE/SPECIFIC SULFIDE TO CYANIDE SILICON DIOXIDE SULFITE SODIUM CHLORIDE DETERGENTS THORIUM SODIUM OXIDE DUST FALL/SOL & INSOL MATTER TIN SODIUM SULFATE DUST FALL/MICROSCOPIC SULFUR TITANIUM FLUORIDE GREASE & OIL SULFUR TRIOXIDE TURBIDITY HARDNESS/CALCIUM VANADIUM T ZINC CARBONATE ZINC ZINC OXIDE HARDNESS/TOTAL HARDNESS/MAGNESIUM ZIRCONIUM HYDRAZINE PCB IDOM WASTE ANALYSIS ET STEEL STEEL STEEL STEEL STEEL STEEL HYDROCARBONS CHARACTERISTIC OF CORROSIVITY IRON CHARACTERISTIC OF E.P. TOXICITY MICROBIOLOGICAL ANALYSIS LEAD ... CHARACTERISTIC OF IGNITABILITY MAGNESIUM CHARACTERISTIC OF REACTIVITY ALGAE MANGANESE HEAT CONTENT BTU'S/LB BACTERIA MERCURY FUNGE? M SHY WT. - NON-COMBUSTIBLE MOLYBOENUM % BY WT. - VOLATILES AT 100°C NICKEL % BY WT. - VOLATILES AT 600 C NIGBIUM ☐ SPECIFIC GRAVITY @ 60°F

CORROSION COUPONS, PER ATTACHED NUMBERED LIST, CLEAN AND WEIGH

DATE SAMPLE TAKEN: 10-10-84

SAMPLE IDENTIFICATION: POST CLEAN UP - SOIL SAMPLE (BLDG. 66)

REMARKS: SAMPLE COLLECTED From Three (3) Jocations near highest

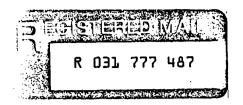
ATTACH. #5

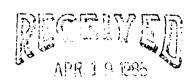
MCDONNELL AIRCRAFT COMPANY

Box 516, Saint Louis, Missouri 63166 (314) 232-0232

Hazardous Waste Management 3/3 PCB 4/1

17 April 1985 MDNR-891C





SLRO

ARRENE!

4rk 40 1985

WASTE MANAGEMENT

REGISTERED MAIL - RETURN RECEIPT

Mr. Mike Duvall Chief, Waste Management Unit Missouri Department of Natural Resources St. Louis Regional Office 8460 Watson Road St. Louis, MO 63119

Reference:

- (a) M. Duvall Letter to J. C. Patterson dated 11 February 1985
- (b) J. C. Patterson Letter to M. Duvall dated 01 March 1985

Enclosure:

- (1) J. C. Patterson Letter to M. Kay dated 09 January 1985
- (2) Industrial Testing Laboratories Test Report dated
- 23 October 1984 Sample Number 4148
- (3) Request for Laboratory Analysis Sample Number 4148

Dear Mike:

This is in response to your request for additional information relevant to the PCB "spills" investigated during your visit of 27 February 1985.

The enclosures provide additional information concerning the "historic" spill of PCB's which resulted in contaminated soil near MDC Building 66. A total of 24 drums of soil was collected and disposed of in Rollins Environmental Services EPA approved incinerator.

The other incident investigated was the spill of approximately 20 gallons of capacitor fluid onto a concrete ramp area near MDC Building 62. Since the amount spilled exceeded the RQ for PCB's, it was reported to the U. S. Coast Guard and Missouri Department of Natural Resources. Note: An attempt was made to contact the U.S. E.P.A. Region VII TSCA NRC.

This spill was immediately contained on-site to prevent any material from leaving the concrete ramp. Absorbant was used to remove the oil from the concrete; solvent was then applied and the contaminated area was scrubbed with a stiff-bristle broom. Absorbant was again used to pick up the solvent residue.

MCDONNELL DOUGLAS

17 April 1985 MDNR-891C

All waste materials were collected in drums and also disposed of in Rollins incinerator.

We believe, and you concurred, that both of these incidents were cleaned up properly. We would appreciate your cooperation in removing MDC St. Louis from the "unreported abandoned waste disposal sites" list, since it is not applicable to this facility. A timely resolution to this problem is requested.

Sincerely,

R. H. Kaatman

Acting Supervisor

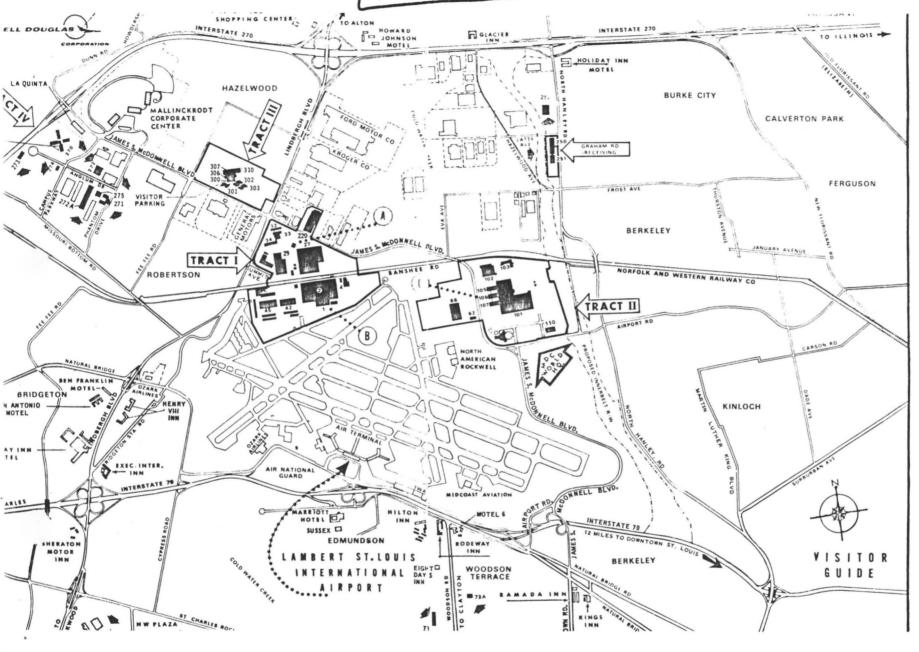
Environmental Compliance

Dept. 891C, Bldg. 305, Lev. 4W

Phone (314) 232-3319

IC: R. E. Bishop, E. M. Myers, J. C. Patterson

ATTACH # 1





- 4. If you generate, as a result of your operating processes, one or more of these listed wastes in excess of 100 kg per month but less than 1000 kg/month your facility is a generator by definition under the Missouri State Hazardous Waste Law and Regulations, but is defined as a "small quantity generator" under the Federal RCRA regulations.
- 5. If you notified us under RCRA because your hazardous waste was identified as "PCB's," you are regulated under the Toxic Substances Control Act (TSCA), and may be exempt from regulation under RCRA.
- 6. You should have checked block "D", Underground Injection, if an injection well is located at your facility. An injection well is defined as any man-made hole in the ground that is deeper than it is wide and that is used for the subsurface placement of fluid, including septic tanks that have the capacity to serve 20 or more people.

In order to correctly identify your facility's status within the program, it is very important that you consider the above points and respond to us in writing within 15 days of the date of receipt of this letter, providing us with the correct information. The letter should be signed by the person who signed the initial notification, or if that person is no longer employed by the facility, it should be signed by his or her successor and your letter should so state. If we do not hear from you within 15 days, it will be necessary to refer your file to our Compliance staff for additional follow-up.

If you have any questions about this process, please contact Ms. Betti Harris, Missouri Coordinator, who can be reached at 816-374-6534.

Thank you for your cooperation.

Sincerely yours,

Robert L. Morby Chief, Waste Management Branch Air and Waste Management Division

cc: David Bedan, Director
Waste Management Program, MDNR

Enclosure